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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WAG ACQUISITION, L.L.C.,

Plaintiff,

v.

**DATA CONVERSIONS, INC., f/k/a
A.E.B.N., Inc., d/b/a Adult
Entertainment Broadcast Network,
AEBN, and pornotube.com;**

**WMM, LLC, d/b/a pornotube.com and
AEBN, LLC;**

WMM HOLDINGS, LLC; and

DOES 1-20,

Defendants.

Civil Action No.: 2:14-cv-02345-ES-JAD

**JOINT MOTION FOR EXTENSION
OF TIME TO RESPOND TO THE
COMPLAINT**

The undersigned hereby jointly move for an Order that the time within which Defendants WMM Holdings, LLC, WMM, LLC, and Data Conversions, Inc. may answer, move or otherwise respond to the Complaint, be extended to May 23, 2014.

The undersigned jointly represent as follows:

1. No previous extension has been obtained.

2. Service of process was effected on the Defendants WMM Holdings, LLC, and WMM, LLC on April 15, 2014, and on Defendant Data Conversions, Inc. on April 30, 2014.

3. The time for Defendants WMM Holdings, LLC and WMM, LLC to answer the Complaint expired on May 6, 2014, and prior to expiration of the time in which to respond to the Complaint the parties reached a mutual agreement to extend the time in which to respond by fifteen (15) days but did not file their agreement with the Court.

4. To formalize the agreement, the parties hereby stipulate that, subject to the Court's approval, the time for these Defendants to answer, move, or otherwise respond to the Complaint may be extended after the due date, as set forth herein. Defendant Data Conversions, Inc.'s answer to the Complaint is currently due May 21, 2014, and would likewise be extended to May 23, 2014 pursuant to this motion.

4. The undersigned jointly make this motion because the undersigned counsel for the Defendants has stated that he needs additional time to respond and has not as yet retained local counsel.

A proposed form of Order is submitted herewith.

Dated: May 15, 2014

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* Not admitted to this Court